

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GARY KOOPMANN, TIMOTHY KIDD and	:
VICTOR PIRNIK, Individually and on Behalf	:
of All Others Similarly Situated,	:
	:
Plaintiff(s),	:
	:
v.	:
	:
FIAT CHRYSLER AUTOMOBILES N.V.,	:
FCA US, LLC, RONALD ISELI AND	:
ALESSANDRO BALDI, AS CO-	:
EXECUTORS FOR THE ESTATE OF	:
SERGIO MARCHIONNE, SCOTT	:
KUNSELMAN, MICHAEL DAHL, STEVE	:
MAZURE and ROBERT E. LEE,	:
	:
Defendants.	:
-----	X

Case No. 15-cv-07199-JMF

Motion Date: September 5, 2019

**NOTICE OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT
AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds, dated August 1, 2019, the accompanying Joint Declaration of Jeremy Lieberman and Laurence Rosen, dated August 1, 2019, the exhibits annexed thereto, all prior papers and proceedings herein, and such additional evidence or argument as may be presented at or before the hearing, Class Representatives Gary Koopmann, Timothy Kidd, and Victor Pirnik (collectively, “Plaintiffs”), individually and on behalf of all Class Members, by and through their undersigned counsel, will respectfully move this Court, before the Honorable Jesse M. Furman, United States District Judge for the Southern District of New York, on September 5, 2019 at 3:00 p.m., in Courtroom 1105 at the Thurgood Marshall United States Courthouse, 40 Foley Square,

New York, New York 10007, for entry of an Order (1) approving the terms and conditions of the proposed Stipulation and Agreement of Settlement, dated April 5, 2019, as fair, reasonable, and adequate for settlement of all claims asserted by the Class against Defendants; (2) approving the proposed Plan of Allocation as a fair and reasonable method to allocate the Net Settlement Fund among Class Members, and (3) entering Final Judgment dismissing this Action with prejudice.

Dated: August 1, 2019

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

Michael J. Wernke

Veronica V. Montenegro

600 Third Avenue, 20th Floor

New York, NY 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

Email: jalieberman@pomlaw.com

mjwernke@pomlaw.com

vvmontenegro@pomlaw.com

-and-

Patrick V. Dahlstrom

10 South LaSalle Street, Suite 3505

Chicago, Illinois 60603

Telephone: (312) 377-1181

Facsimile: (312) 377-1184

Email: pdahlstrom@pomlaw.com

THE ROSEN LAW FIRM, P.A.

/s/Laurence M. Rosen

Laurence M. Rosen

Phillip Kim

Sara Fuks

275 Madison Avenue, 34th Floor

New York, New York 10016

Telephone: (212) 686-1060

Facsimile: (212) 202-3827

Email: lrosen@rosenlegal.com

pkim@rosenlegal.com

sfuks@rosenlegal.com

Co-Class Counsel for Plaintiffs

**BRONSTEIN, GEWIRTZ
& GROSSMAN, LLC**

Peretz Bronstein

60 East 42nd Street, Suite 4600

New York, NY 10165

Telephone: (212) 697-6484

Email: peretz@bgandg.com

Additional Counsel for Plaintiffs